



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

October 09, 2018

BY ELECTRONIC MAIL

Robert Law, Ph.D.  
de maximis, inc.  
186 Center Street, Suite 290  
Clinton, New Jersey 08809

Re: Draft 2017 Annual Visual Cap Monitoring Report for the River Mile 10.9 Removal Action, Dated December 01, 2017

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) reviewed the Cooperating Party Group's (CPG) *Draft 2017 Annual Visual Cap Monitoring Report for the River Mile 10.9 Removal Action*, dated December 01, 2017. The report was prepared by AECOM for the Lower Passaic River Study Area.

EPA transmits this comment letter in accordance with Paragraph 27 of the Agreement. Please proceed with revisions to the Monitoring Report within 30 days consistent with the enclosed comments. If there are any questions or clarifications needed, please contact me to discuss.

Sincerely,

A handwritten signature in dark ink, appearing to read "Diane Salkie".

Diane Salkie, Remedial Project Manager  
Lower Passaic River Study Area

Enclosure

Cc: Zizila, F. (EPA)  
Sivak, M. (EPA)  
Hyatt, B. (CPG)  
Otto, W. (CPG)

**Draft 2017 Annual Visual Cap Monitoring Report for the River Mile 10.9 Removal Action, Dated  
December 01, 2017**

No.	Section	Comment																																				
1	General Comment	The terms “less dense” and “spotty”, as they pertain to the armor layer assessment, should be clearly defined in the text. This clarification will help the reader to understand if armor stone is potentially not present at these portions of the cap.																																				
2	General Comment	The poling results provide more useful information than visual observations alone, and should be considered for future monitoring events. Furthermore, the two poling grids indicate that variability in armor stone may exist over small distances. Therefore, it is recommended that the grid approach (or some variation thereof) be considered at each transect during future monitoring events. Future monitoring reports should also include baseline thicknesses as well as any prior thickness measurements to better compare trends.																																				
3	Page 3-1, Section 3.2, first sentence	Similar to USEPA Comment #19 on the Long-Term Monitoring and Maintenance Plan Baseline Report, add clarifying text as to how the number of poling locations per transect were determined.																																				
4	Page 3-1, Section 3.3	Revise the text to discuss the process of selecting locations for the 3-foot by 3-foot poling grids to evaluate uncertainties in poling measurements. Please also revise the text to explicitly note that results of poling from these grids are not counted in any general counts of poling results (e.g. Page 4-1, Section 4.1, list item #2 – “four locations of spotty armor” does not include any locations of spotty armor identified in the grids).																																				
5	Page 3-1, Section 3.3, second sentence and Figure 2	<p>The document identifies the grid near station 0605 as having seven locations out of 36 hitting geotextile fabric instead of armor stone. However, USEPA oversight personnel recorded 3 additional locations (highlighted in yellow below) hitting geotextile fabric that the CPG noted as hitting armor stone. Please confirm the number of locations at this grid where geotextile fabric was encountered instead of armor stone. At another location (highlighted in red below), USEPA oversight personnel recorded 21.5 feet to geotextile, compared to the CPG’s presented value of 20.5. Please confirm this value.</p> <table><tr><td>18</td><td>18</td><td>18.5</td><td>16</td><td>20</td><td>17.5</td></tr><tr><td>16</td><td>19</td><td>21</td><td>18</td><td>24</td><td>21.5</td></tr><tr><td>22</td><td>17</td><td>17.5</td><td>12.5</td><td>22</td><td>21.25</td></tr><tr><td>22</td><td>19</td><td>19</td><td>16.75</td><td>20.5</td><td>17</td></tr><tr><td>20</td><td>18.5</td><td>14.25</td><td>21.5</td><td>18.75</td><td>18.75</td></tr><tr><td>19.75</td><td>22.5</td><td>16</td><td>21.25</td><td>18</td><td>17.75</td></tr></table>	18	18	18.5	16	20	17.5	16	19	21	18	24	21.5	22	17	17.5	12.5	22	21.25	22	19	19	16.75	20.5	17	20	18.5	14.25	21.5	18.75	18.75	19.75	22.5	16	21.25	18	17.75
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No.	Section	Comment
6	Page 4-1, Section 4.1, list item #2 and Figure 1	This section of text references “four locations of spotty armor”. However, Section 3 identifies only two locations of spotty armor on transects B and G, with two other locations on transect F as having a “less dense” armor layer. Figure 1 also only identifies two locations (on transects B and G) where the armor layer is “spotty or not detected”. Please resolve these discrepancies. See also general comment #1